

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DWAYNE R. TORRENCE, JR.,

Plaintiff,

v.

BARTELS, M.D., *et al.*

Defendants

Civil Action No. SAG-20-1223

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Dwayne R. Torrence, Jr. and Defendants, by their undersigned counsel, jointly move for an Order modifying the Court's June 2, 2021 Scheduling Order.

As grounds for this Motion, the parties state as follows:

1. The parties have met and conferred about the deadlines set out in the June 2, 2021 Scheduling Order.
2. At the same time, the parties discussed the production of documents.
3. Defendants are still in the process of responding to Plaintiff's First Request for Production of Documents that Plaintiff served on April 7, 2021.
4. Defendants' employer, Corizon Health Inc., is in the process of responding to Plaintiff's Subpoena to Corizon Health Inc. to Produce Documents, Information, or Objects, which Plaintiff served on July 19, 2021.
5. Jessup Correctional Institution, where Plaintiff is incarcerated, is in the process of responding to Plaintiff's Subpoena to Jessup Correctional Institute to Produce Documents, Information, or Objects, which Plaintiff served on July 19, 2021.

6. Based on the parties' discussion and on the above facts, the parties agree that an extension of the current deadlines will allow the case to be best developed for presentation to the Court.

7. Specifically, the parties believe a ninety-day extension of the current deadlines would be optimal. No party will be prejudiced by these modifications and there is no trial date currently scheduled.

8. The parties jointly request that the Scheduling Order be modified as follows:

November 18, 2021:	Plaintiff's Rule 26(a)(2) disclosures
December 13, 2021:	Defendants' Rule 26(a)(2) disclosures
December 30, 2021:	Plaintiff's rebuttal Rule 26(a)(2) disclosures
January 6, 2022:	Rule 26(e)(2) supplementation of disclosures and responses
January 31, 2022:	Discovery deadline; submission of status report
February 7, 2022:	Requests for admission
March 3, 2022:	Dispositive pretrial motions deadline

A proposed Order to this effect is attached.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

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